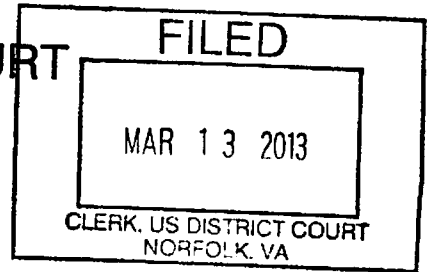


UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division



**Cassandra L. Lee,**

Plaintiff,

vs.

Civil Action No. 2:13CV109  
(Amended)

**Virginia Beach Sheriff's Office**

2501 James Madison Blvd., Virginia Beach, VA  
23456

**Ken Stolle**, Sheriff of the City of Virginia Beach,  
Virginia, in his individual and official capacity,

**Paul Lantaigne**, Former Sheriff of the  
City of Virginia Beach, Virginia, in his individual  
and official capacity,

**Marc F. Schuster**, Individually and in his official  
capacity as Chief Deputy with the Sheriff's Office

**Dennis Free**, individually and in his official capacity  
as Chief Deputy with the Sheriff's Office

**Elliot Ortiz**, individually and in his official capacity as  
Captain with the Sheriff's Office

**Helene Quick**, individually and in her official capacity  
as Personnel/Human Resource Director with the  
Sheriff Office

Defendants.

COMPLAINT

**I. Preliminary Statement**

1. This is a civil action wherein the plaintiff, Cassandra L. Lee, (the "plaintiff"), alleges that her former employer Paul Lantaigne ("defendant"), the former Sheriff and at that time Ken Stolle ("defendant"), the Sheriff Elect of the City of Virginia Beach, Virginia, engaged in discriminatory and retaliatory acts against her in violation of Title VII of the Civil Rights Act of 1964, 704(a) as amended and 42 U.S.C. Section 2000e et. seq., and the Virginia Human Rights Act, VA Code, 2.2-3900. et. seq.

## **II. Jurisdiction and Venue**

2. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 in that the Defendant was doing business in this district, and the activities giving-rise to the plaintiff's claim took place in this district.
3. Plaintiff timely filed two charges of discrimination and two charges of retaliation in violation of Title VII, with the EEOC.

## **EEOC DETERMINED SUFFICIENT CAUSE**

4. The EEOC determined that there was sufficient cause on all charges filed. All efforts to conciliate these charges as required by Title VII of the Civil Rights Act of 1964, 704(a) as amended, were unsuccessful with the defendant and were then forwarded to the Department of Justice for possible litigation. The plaintiff received a 90 day right to sue letter from Department of Justice. The plaintiff timely filed charges of two counts of discrimination and two counts retaliation in violation of Title VII, with the United States District Court, Eastern District of Virginia, Norfolk Division. *The following is an amendment to the plaintiff's original charge filed.*
5. The EEOC determined (on case 437-2009-00738) that "Based on the evidence revealed there was sufficient cause to believe the Charging Party [Cassandra Lee] was subjected to discrimination because of her race (Black) and gender (female) and retaliated against for her opposition to discrimination."
6. The EEOC determined (on case 437-2010-00843) that "Based on the evidence revealed there was sufficient cause to believe the Charging Party [Cassandra Lee] was subjected to discrimination because of her race (Black) and gender (female) and retaliated against for her opposition to discrimination."

## **III. Parties**

7. The Plaintiff, **Cassandra Lee**, (hereinafter "Lee") is a Black female and a citizen of the United States.
8. Defendant **Ken Stolle**, (hereinafter the "Sheriff Elect" or "Stolle") is a Caucasian male and a government official, the Sheriff Elect for the City of Virginia Beach, within the Commonwealth of Virginia. At all times relevant to this action, Stolle was the Sheriff Elect for the City of Virginia Beach and acted within the scope and course of his pending employment. Stolle is sued in his official and individual capacity.

9. Defendant **Paul Lanteigne**, (hereinafter the "former Sheriff" or "Lanteigne") is a Caucasian male and was a government official, the Sheriff for the city of Virginia Beach, with in the Commonwealth of Virginia. At all times relevant to this action Lanteigne acted within the scope and course of his employment. Lanteigne is sued under is former official and individual capacity.
10. Defendant **Marc F. Schuster**, (hereinafter the "Chief or Schuster") is a Caucasian male and a government official, the Chief Deputy Sheriff for the Sheriff's Office for the City of Virginia Beach, within the Commonwealth of Virginia, given the title of Chief Deputy. At all times relevant to this action, Schuster acted within the scope and course of his employment. Schuster is sued in his official and individual capacity.
11. Defendant **Dennis Free**, (hereinafter the "Chief or Free") is a Caucasian male and a government official, the Chief Deputy Sheriff for the Sheriff's Office for the City of Virginia Beach, within the Commonwealth of Virginia, given the title of Chief Deputy. At all times relevant to this action, Free acted within the scope and course of his employment. Free is sued in his official and individual capacity.
12. Defendant **Elliot Ortiz**, (hereinafter the "Ortiz") is a Hispanic male and a government official, a Captain of the Sheriff's Office of Virginia Beach and acted within the scope and course of his employment. Ortiz is sued in his official and individual capacity.
13. Defendant **Helene Quick**, (hereinafter the "Ms. Quick") is a Caucasian female and a civilian employee for the Sheriff's Office, given the title of Personnel and Human Resource Director acted within the scope and course of her employment. Ms. Quick is sued in her official and individual capacity.

#### IV. Facts

14. Plaintiff Lee was employed with the Sheriff's Office of the City of Virginia Beach, Virginia from March 1990 until December 31, 2009, and was five months short of twenty years. On December 16, 2009, Sheriff-Elect Stolle claimed he and former Sheriff Lanteigne (not present during meeting) had consulted the City Attorney and had jointly agreed not to reappoint Lee, (referred to herein as "reappoint" or "reappointment") Ms. Quick was present during this meeting. The Plaintiff was informed orally and in writing that former Sheriff and Sheriff-Elect had decided not to

reappoint Lee into office in December 2009. When the Plaintiff asked why she was not reappointed, no concrete explanation was given to her, she was told by Sheriff-Elect that it was due to Lee's unwillingness to work with Chiefs Schuster and Free. However, on three separate occasion Lee told Stolle she was willing to work with the Chiefs as long as she was treated fairly. Stolle also informed Lee that he did not believe that her goals and his goals for the Sheriff's Office were compatible. Although the Sheriff-Elect was aware of the pending EEO complaint. He also stated that he would make sure she received her retirement because she was so close to her twenty years. He said he might also reconsider reappointing Lee, later (but he wanted to get in office to see what was actually, taking place), because of her past record (*verbal and written implied promises*). He stated that he would not be part of the complaint because he had not read and was not going to read the complaint. He also stated that he was not going to and would not investigate the former Sheriff or his Chiefs. Ms. Quick advised him that he would be involved in the complaint because he and the former Sheriff decided together not to reappoint Lee.

15. In December 2, 2009, Sheriff-Elect Stolle conducted interviews with all of the command staff, everyone was order to submit an updated resume to Stolle. The lieutenants and captains (except for Captain Victoria Thomson, she may have been interviewed on a separate date but it was not noted on the memorandum received by the aforementioned) were interviewed. During the interviews the captains were asked to rate each captain from great to least. Every captain rated Lee as the least favored captain. Sheriff-Elect also used this information to base his decision on reappointment. This information was also given to EEOC as part of their Investigation.

16. Before her dismissal, Lee had a stellar career as Sheriff-Elect Stolle pointed out in their meeting on December 2, during the meeting he commended her on her accomplishments which listed her as:

- 1st Commanding Officer of Corrections to receive 100 percent compliance from Department of Corrections
- 1st Female Commanding Officer of Corrections
- 1st Minority Female Captain Commanding Officer
- 1st African American Female Lieutenant
- 1st Female and Minority Lieutenant assigned to Professional Standards and Accountability

Former Member of the Virginia Beach EEOC Advisory Committee, Sheriff's Office EEO Representative

Through collaborative efforts of the Virginia Beach Police Department, Mental Health Services, National Alliance on Mental Illness NAMI and the Virginia Beach Sheriff's Office established Crisis Intervention Team CIT and the CIT. One of the original members of the Crisis Intervention Team Project (CIT) Coalition, we received grant funding to start and support our program

Wrote and implemented Inmate Grievance Procedure policy and procedure Bachelors Thesis

17. Similarly in October 23, 2005, Lee was promoted to captain and became the first minority female to command corrections. She was interviewed by the Virginian Pilot, at the request and approval of Lanteigne. In the article Lanteigne stated, *"Lee is firm but fair - a natural fit as commanding officer. Because of her rapport, people look to her to fix problems."* Schuster also, made comment in the same article stating, *"It takes a special person to take on challenges and create a warm environment for the rank and file. Her doors are really wide open. She always tries to bring humor into it. In this type of job, that is a big plus."*
18. As a ranking captain and the practice of the Sheriff's Office, the captains were excluded from annual evaluations. There were no checks and balances for the command staff. Although she did not receive annual evaluations as a captain her prior performance was successful and productive and she was never formally counseled during her nineteen year and seven month career.
19. Plaintiff had been a productive and competent employee fully qualified and capable of the position that she occupied as well as her peers and those of higher rank.
20. Lee's subordinates (lieutenants and sergeants) continually advised and complained that documents that were forwarded up the chain of command to Schuster routinely were missing, they were short staffed, and the sergeants complained that Schuster might be favoring a paramour with female deputies assigned to Lee's division, as well as male deputies (known as 'Schuster's boys'). Due to these concerns Lee spoke with Schuster about these problems but they were never addressed or corrected.
21. The former Sheriff and Sheriff-Elect were also familiar with the Schuster's boys and Schuster had been the subject of past anonymous investigations for his indiscretions with female deputies.
22. The Sheriff's Office was not in the practice of investigating anonymous complaints.

23. In the early part of 2009, creating a hostile work environment of discrimination and retaliation against Lee prior to and there after when she complained to Lanteigne about Schuster and Free. No or inadequate discipline or investigation was imposed upon Schuster or Free despite the fact that their actions were discriminatory in nature. Their actions were malicious, demeaning, manipulative, disruptive, and they incited (peers, subordinates, and civilian staff) to participate in their discriminatory and retaliatory behavior. These individuals including the former Sheriff caused embarrassment to the Office, diminishing the close working relationship of faithful employees, diminishing the trust and teamwork necessary in an environment which placed staff in a dangerous position, undermining the expectation and diminishing the confidence of the staff and public, and the former Sheriff and the Chiefs abused their power and tried to induce fear.
24. After making a formal complaint to the former Sheriff, Lee was treated differently from her peers (white males and one Hispanic male 'Ortiz'), who had held the position before Lee. When an inmate was release in error and complaints were received from bail bondsmen for the delay in inmate releases her male co-workers were allowed to handle their daily operation without the Chiefs involvement. However, Schuster order her subordinates to handle these issues or the issue went directly to Free who was not in her direct command. She was relieved of all of her extra outside assignments (Crisis Intervention CIT), ordered to do clerical duties, increased surveillance was placed on her, Lee had to meet with both Chiefs whenever there were concerns in her division, and she was ordered to violate Department of Correction Minimum Standard for Jail and Lockups. These actions adversely affected Lee because she was subjected to discrimination and retaliation.
25. After another inmate was released in error and Audit was conducted in Lee's division, which had never been before in Lee's nineteen plus years of service. Lee's white male and Hispanic male co-workers were never subjected to an audit, reprimand, transfer, demotion, or termination (non-reappointment).
26. Lee was transferred to another division (Civil Process) and to a position that had been held by a lieutenant, she was limited to only working Civil Process when the prior commanding officer (all white males) were responsible for Court Security and Civil Process, received a written reprimand, her peer

Ortiz was allowed to retaliate against her by starting an internal investigation on her for missing a DARE graduation (the internal investigation was drafted as if she had missed a court appearance, which is a class 1 misdemeanor), and she was not reappointed. ***(Tangible employment action)***

27. The Inake/Release area of corrections where Lee was assigned, is the most high traffic area in the jail, however Lee and her staff experience a never seen before routinely decrease in staffing. This caused a disruption of the daily operations and placed deputies, police, civilians and inmate at risk. While the corrections staff was over staff and were able to allow 10-15 deputies where approved leaved on any given day. ***(retaliation) After Lee was transferred to Civil Process the Commanding Officer who replaced her (white male) all of the staffing she lost during that year, was returned to the division and ran with full capacity. He was also allowed to interact directly with bail bondmen complaints and he nor his staff had to sign off on inmate release sheets.***
28. As a lieutenant assigned to Professional Standards (Internal Affairs), the plaintiff learned to take detailed notes and investigative skills.
29. There exists in the Sheriff's Office for the City of Virginia Beach a systematic and widespread pattern and practice of retaliation against those who oppose unfair practices by the command staff. They are usually transferred and in some cases the harasser is transferred but they are not subject to reprimand.
30. There exists in the Sheriff's Office for the City of Virginia Beach a policy, procedure, and practice to retaliate against those who oppose discrimination and who would testify truthfully regarding incidents occurring in the Sheriff's Office that would bring public embarrassment to the Office. Because these issues arose during an election year the former Sheriff neglected his duties when he refused to investigate Lee's allegations to avoid public embarrassment. From the being of February 2009 to December 16, 2009, Lanteigne had numerous opportunities to rectify Lee's allegations.
31. There was a policy in place for discrimination, but the command staff did not adhere nor were they subject to the policy. If a formal complaint was lodged against a captain or lieutenant the former

Sheriff would move the captain, lieutenant or the complainant to another division. Therefore violating the policy put in place by the former Sheriff and leaving the complainant subjected to retaliation.

32. There was no policy in place covering retaliation.

33. The Sheriff's policy for filing a complaint at the command level is nonexistent, not efficient and is legally insufficient.

34. Lantaigne, Stolle, Schuster, Free, Ortiz, and Quick in their individual capacities, acted with actual intent, blatant disregard, and/or reckless indifference amounting to vengefulness towards Lee, agreeing and intending to oppress and cripple her because of her opposition to unfair treatment. Lee's rights and privileges were not secured by the Constitution and laws of the United States, those rights included the right to oppose unfair treatment and unlawful employment practices under Title VII.

35. SEC. 2000e-3. *[Section 704]*

(a) Discrimination for making charges, testifying, assisting, or participating in enforcement proceedings

It shall be an unlawful employment practice for an employer to discriminate against any of his employees or applicants for employment, for an employment agency, or joint labor--management committee controlling apprenticeship or other training or retraining, including on--the-job training programs, to discriminate against any individual, or for a labor organization to discriminate against any member thereof or applicant for membership, because he has opposed any practice made an unlawful employment practice by this subchapter, or because he has made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under this subchapter.

36. SEC. 2000e-2. *[Section 703]*

(a) Employer practices

It shall be an unlawful employment practice for an employer -

- (1) to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin; or
- (2) to limit, segregate, or classify his employees or applicants for employment in any way which would deprive or tend to deprive any individual of employment opportunities or otherwise adversely affect his status as an employee, because of such individual's race, color, religion, sex, or national origin.

37. 2.2-3900. Short title; declaration of policy.

A. This chapter shall be known and cited as the Virginia Human Rights Act.

B. It is the policy of the Commonwealth to:



1. Safeguard all individuals within the Commonwealth from unlawful discrimination because of race, color, religion, national origin, sex, pregnancy, childbirth or related medical conditions, age, marital status, or disability, in places of public accommodation, including educational institutions and in real estate transactions; in employment; preserve the public safety, health and general welfare; and further the interests, rights and privileges of individuals within the Commonwealth; and

2. Protect citizens of the Commonwealth against unfounded charges of unlawful discrimination.

38. Lanteigne, Schuster, Free, and Quick knowingly and deliberately with intent

discriminated against Lee without forethought. Lanteigne, Schuster, Stolle, Free, Ortiz, and Quick knowingly and with intent to retaliate took actions harmful and

detrimental to Lee, which adversely affected her employment, and affected her

and her families physical health, mental health, and their financial stability. The

integrity of the Office was jeopardize and damaging. <sup>1</sup>

#### **V. Count One**

***Violation of Title VII of the Civil Rights Act of 1964, 704(a) as amended***

***Virginia Human Rights Act, VA Code, 2.2-3900. et. seq.***

***Discrimination 437-2009-00738***

***Against Paul Lanteigne and the Office of the Sheriff***

39. Former Sheriff and the Sheriff's Office is/was employer and the subject to

Title VII under 42 U.S.C.A. Section 2000e (a) The term "person" includes

one or more individuals, governments, governmental agencies, political

subdivisions, labor unions, partnerships, associations, corporations, legal

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#### **<sup>1</sup> Retaliation**

The laws enforced make it illegal to fire, demote, harass, or otherwise "retaliate" against people (applicants or employees) because they filed a charge of discrimination, because they complained to their employer or other covered entity about discrimination on the job, or because they participated in an employment discrimination proceeding (such as an investigation or lawsuit). The law forbids retaliation when it comes to any aspect of employment, including hiring, firing, pay, job assignments, promotions, layoff, training, fringe benefits, and any other term or condition of employment.

representatives, mutual companies, joint-stock companies, trusts, unincorporated organizations, trustees, trustees in cases under title 11, or receivers. (b) The term "employer" means a person engaged in an industry affecting commerce who has fifteen or more employees for each working day in each of twenty or more calendar weeks in the current or preceding calendar year, and any agent of such a person.

40. Plaintiff (black/female) engaged in protected activities under Title VII in opposing the alleged unlawful employment practices of Lanteigne and the Sheriff's Office of the City of Virginia Beach.

41. Plaintiff was subjected to clerical assignments and ordered to sign off on every inmate release sheet, was not allowed to interact with individual complaints or concerns directly related to her division, her subordinates were ordered not to keep her informed of daily operation (to make it seem as if she was not doing her job), plaintiff was subjected to increased surveillance, staff was decreased, was relieved of all outside assignment details, her division underwent an intense audit conducted by subordinates in other divisions and some who directly related to the inmates released in error, after the audit she was received a written reprimand, transferred, given a position that had been held by a Lieutenant, and was retaliated against by her peers.

42. Plaintiff suffered adverse employment action which was causally connected between the plaintiff's actions and the harm suffered.

43. Plaintiff met with the former Sheriff on numerous occasions about her unfair treatment however, the former Sheriff failed to act. Therefore violating Sheriff's Office policies and procedures and her civil rights.
44. The former Sheriff and Chiefs gave Lee and her subordinates conflicting information about her treatment, orders, and leadership.
45. As a result of the Defendants' discriminatory actions and utterances, and because of her original complaint made to the former Sheriff regarding unfair treatment; her allegations and claims are supported by the final EEOC investigative report, her copious notes, and the support of her subordinates.
46. Although Lee's peers and supervisors including the former Sheriff, dejected, demeaned, and oppressed her; her subordinates remained loyal, concerned, and supportive of Lee. Even to the point of risking their own careers; which will be revealed in the EEOC investigation.
47. As a result of the Defendants' discriminatory actions the plaintiff has suffered and will continue to suffer irreparable harm and injury as a result of the Defendants' discrimination and wrongful acts.
48. The acts of the defendants and the employees or agents of defendants were not isolated or trivial.

**VI. Count Two**

***Violation of Title VII of the Civil Rights Act of 1964, 704(a) as amended***

***Retaliation 437-2009-00738***

***Against Paul Lanteigne and the Office of the Sheriff***

49. The Sheriff is responsible for the acts of his deputy sheriffs under Virginia law.<sup>2</sup>
50. The supervisory defendants tacitly authorized or were indifferent to the specified condition stated herein and are therefore personally liable under 42 U.S.C. Section 1981. The supervisory indifference and/or tacit authorization of the subordinates' misconduct was a causative factor in the civil rights injuries they inflicted on the plaintiff.
51. The actions of the defendants were blatantly committed by all of the aforementioned defendants under the Sheriff's Office policy and procedures and the laws governed by the Commonwealth of Virginia.
52. Their action violated the plaintiff's rights under Title VII.
53. The interests of the Sheriff or any employer promoting the efficiency of their office or business through which their employees must be subjected to the Offices' that requires them to testify or file a grievance must be free to do so without fear of retaliation or reprisals and the public policy behind Title VII, and other civil rights laws.
54. The plaintiff was labeled a mole because it was rumored that she voted against Stolle during his campaign. This was also done for retaliatory reasons to manipulate and cover up the defendants discriminatory acts.
55. After taking a fall in the dwelling place of the Office of the Sheriff, the former Sheriff, Sheriff-Elect, Free, Schuster, Quick, and Ortiz all failed to report to the Workmen's Comp Board that the stairs in which the plaintiff fell from were not in compliance with OSHA standards. Although it was reported to the staff in that division. The plaintiff lost this case because of the negligent behavior due to retaliation. The stairs have been replaced.

### **VII. Count Three**

#### ***Violation of Title VII of the Civil Rights Act of 1964, 704(a) as amended 42 U.S.C. Section 2.2-3900 Discrimination 437-2010-00843***

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<sup>2</sup> 1995 U.S. Dist. LEXIS 19952 Carlton V. Williams (E.D. Va 1995) n.2. (The United States Court of Appeals for the Forth Circuit has held that a sheriff may be responsible for the acts of a deputy sheriff. Scott v. Vandiver, 476 F.2d 238, 242 (4th Cir. 1973). The Forth Circuit found that under South Carolina law, the sheriff was responsible for the deputy's acts and was not insulated by the doctrine of respondent superior, and that section 1983 allowed the court to resort to state law to supply the elements of the civil rights claim. Id. at 240\_43. Whited v. Fields, and McBride v. McCabe

***Against Paul Lanteigne, Ken Stolle and the Office of the Sheriff***

56. As previously stated on paragraph 39.

57. Plaintiff was not reappointed and was subjected to discriminatory acts by former Sheriff (Lanteigne) and Sheriff-Elect (Stolle) because of her race (Black) and her gender (female). The plaintiff was not reappointed because the active EEOC complaint.

**VIII. Count Four**

***Violation of Title VII of the Civil Rights Act of 1964, 704(a) as amended***

***42 U.S.C. Section 2.2-3900 Retaliation 437-2010-00843***

***Against Paul Lanteigne, Ken Stolle and the Office of the Sheriff***

58. The Plaintiff was not reappointed in retaliation because of an active case with EEOC. However, in a Sheriff's Office newsletter dated 10/01/09 concerning budget cuts, Lanteigne stated, "I will do everything in my power to avoid layoffs. I can not, however, guarantee that layoffs are completely out of the equation. The one thing that I can assure you of is that should layoffs occur they will not be dealt with in the typical government process of last hired - first fired. We will examine each personnel file, checking the annual evaluations, disciplinary actions and other documented work behavior. As has always been our philosophy - working here will be based on performance." If Lee had no other infractions she should have been reappointed.

59. The former Sheriff, Schuster, and Free made conflicting claims to the plaintiff, first stating she was a poor leader, second explaining that she was doing her job well and she was a strong leader, and finally explaining that Lee and her subordinates failed to lead.

60. The plaintiff believes that due to her active charges against the Virginia Beach Sheriff's Office she was blackballed because of her boldness to confront her attackers head-on and she was ***not reappointed***; the plaintiff was unable to secure employment in her chosen profession (law enforcement). Not being reappointed by the Sheriff is a very negative connotation in the political arena. The Plaintiff also due to the nature of the charges against the former Sheriff and Sheriff-Elect Stolle (who was a former Senator)

she has was unable to secure employment because of the negative undertones of filing a charge against an employer with such political clout.

61. The defendants released a statement to the EEOC investigator that claimed she was disgruntled. The plaintiff believes that this information may have been relayed to potential employers as well.

#### Mediation Attempts

The plaintiff and the EEOC has exhausted every effort to discuss, correct, and squash her complaint against the former Sheriff, the Sheriff-Elect and his office by:

1. Meeting with Lanteigne on three separate occasions and at no time during the alleged discriminatory acts, did the former Sheriff commence an internal investigation or discipline the Chiefs, or Ortiz. Although Sheriff's Office policy, procedure and practice was to investigate all formal complaints. Even after receiving the formal charge from EEOC. Both (former Sheriff and Sheriff-Elect) refused to investigate.
2. The plaintiff also, met with Quick because she was the Human Resource Director. Her title alone obligates her to act under the color of the law on civil rights matters.
3. The former Sheriff and Chiefs did offer minor resolutions to the plaintiff. (transferred which was a penalty, sick leave, and a flimsy apology)
4. Sheriff-Elect Stolle also made minor offers to Lee; which alluded to her dropping her charges and/or else not be reappointed when he met with her on three separate occasions.
5. After her second charge of discrimination and retaliation was filed, EEOC offered mediation which was declined.
6. EEOC also offered a Fact Finding Conference, which was disruptive in nature. At the start of the conference Sheriff-Elect Stolle and his attorney disapproved of Lee being present. Although their notice explained that Lee would be present. They also were disrespectful to the Director and his investigator from the start of the proceedings.

Stating, 'How are we to know you have been impartial in these matters'. As the EEOC investigation will show.

7. When the investigator completed the investigation conciliations for both charges were then offered to settle these charges, but Sheriff-Elect Stolle declined.

WHEREFORE, with respect to Counts 1-4, the plaintiff respectfully prays that this Court:

- A. Issue a declaratory judgment that the defendants acts, policies, procedures, and practices grieved of, violated the plaintiff's civil rights as secured by 42 U.S.C. Section 2000e et seq; and
- B. Make whole remedies and restore financial losses due to the harassment she incurred. The defendant to reinstate Lee with full benefit back pay with interest;
- C. Order defendant to instate front pay (because it would be inappropriate to be reinstated or return to the Sheriff's Office) to included any and all increases (holiday and annual leave) based on Lee's passed employment she would have remained employed if she had not been let go. Front pay is requested until what would have been her 25 year retirement or to be shown at trial, if appropriate in an amount to be proved at trial;
- D. Although Lee is not with the Office she would like to request Injunctive Relief for those still employed. To cover retaliation and the need to correct the nonexistent policy that over looks and ignores the command staff being subject to complaints;
- E. Order the defendant to expunge from Lee's personnel file of adverse personnel actions taken during her last year of employment and all references to her discharge or non-reappointment;
- F. To enjoin further retaliation by the defendants and restrictions and violations of plaintiff's Civil rights.
- G. Order the defendants Lanteigne, Stolle, Schuster, Free, Ortiz, and Quick to fully compensate the plaintiff for the damages suffered by them, including without limitation damages for emotional, physical, and financial distress (imposed on the plaintiff and her

family), humiliation, embarrassment, injury to reputation, any and all medical bills and injury to earning capacity, losses to savings and the like, both past and future awarding compensatory damages in the amount of \$10,000,000.00 or such greater amount as may be proved at trial or such other sum as the law may provide.

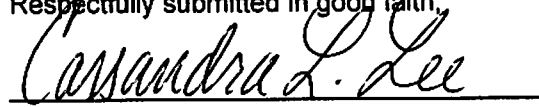
H. Order all defendants in their individual capacities to pay punitive damages to plaintiff.

I. Grant such additional relief as the Court deems just and proper.

**A TRIAL BY JUDGE IS REQUESTED**

This 11th day of March, 2013

Respectfully submitted in good faith,

A handwritten signature in cursive script, reading "Cassandra L. Lee", is written over a horizontal line.

Cassandra L. Lee